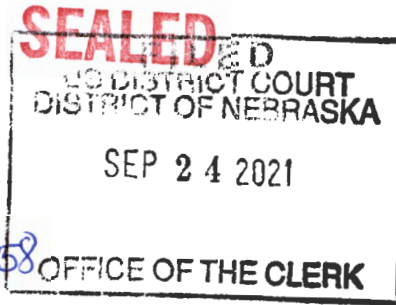


IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA



UNITED STATES OF AMERICA,

Plaintiff,

vs.

LINDA JENKINS,

Defendant.

8:21CR 258

INDICTMENT
18 U.S.C. § 1344
18 U.S.C. § 1028A(a)(1)

The Grand Jury charges that

COUNTS I THROUGH III

1. In or about August 2020, in the District of Nebraska and elsewhere, the defendant, LINDA JENKINS, knowingly executed, and attempted to execute, a scheme and artifice to defraud financial institutions and to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, a financial institution, by means of materially false and fraudulent pretenses, representations, and promises, as stated below (“the Scheme”):

The Purpose of the Scheme

2. The purpose of the Scheme was for JENKINS to enrich herself and others unlawfully by falsely and fraudulently posing as actual bank customers, presenting false identification documents and other items and unlawfully withdrawing funds from customers’ home equity lines of credit and/or other accounts at financial institutions.

Manner and Means of the Scheme

3. To achieve the purpose of the Scheme, JENKINS used the following manner and means, among others.

4. During the Scheme, JENKINS traveled with other participants in the Scheme (“Confederates”), to and through the states of Iowa and Nebraska.

5. Confederates provided to one another:

- a. the names of actual customers,
- b. account information for the customers at financial institutions,

- c. false identification documents, credit cards and other items in the names of actual customers but bearing JENKINS's or a Confederate's picture, and
 - d. direction concerning the transaction to conduct or attempt to conduct.
6. JENKINS kept track on her cell phone of the customers whose identities she assumed.
7. Using the account information, false identification and other documents, JENKINS and Confederates falsely represented themselves to be customers with accounts at the financial institutions, and withdrew funds from those customers' home equity lines of credit and/or from other accounts. JENKINS and Confederates obtained the funds in cash, in the form of a check, and/or by instructing the financial institution to transfer funds to another account.
8. JENKINS and Confederates provided transportation to one another to conduct the fraudulent transactions at financial institutions.
9. JENKINS and Confederates typically conducted and attempted to conduct a series of such fraudulent transactions at financial institutions and/or their branches in a particular city over several days, after which they moved to another city and repeated the process.

The Financial Institutions

10. Bank A, known to the Grand Jury, was a financial institution within the meaning of Title 18, United States Code, Section 20, being a depository institution insured by the Federal Deposit Insurance Corporation. Bank A was based in Sioux Falls, South Dakota, and maintained branches throughout the United States, including the District of Nebraska.

The Executions of The Scheme

11. On or about the dates stated below, JENKINS executed, and attempted to execute, the Scheme in the manner described above:

COUNT	DATE	BANK AND LOCATION	TRANSACTION
I	08/21/20	Bank A, 3536 Comstock Ave, Bellevue, Nebraska	Attempted withdrawal of \$8,700.00 from account of customer S.A.
II	08/22/20	Bank A, 4707 S 96 th St, Omaha, Nebraska	Withdrawal of \$8,900 in cash, one \$33,875.00 cashier's check, and one \$7,650.00 cashier's check from account of customer L.E.

III	08/25/20	Bank A, 4650 S. 24 th St, Omaha, Nebraska	Attempted withdrawal of \$9,000.00 from account of customer J.G.
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All in violation of Title 18, United States Code, Section 1344.

COUNT IV

On or about August 21, 2020, at or near 3536 Comstock Ave, Bellevue, in the District of Nebraska, the defendant, LINDA JENKINS, did knowingly possess and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, Bank Fraud in violation of 18 U.S.C. § 1344, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT V

On or about August 22, 2020, at or near 4707 S 96th St, Omaha, in the District of Nebraska, the defendant, LINDA JENKINS, did knowingly possess and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, Bank Fraud in violation of 18 U.S.C. § 1344, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT VI


On or about August 25, 2020, at or near 4650 S. 24th St, Omaha, in the District of Nebraska, the defendant, LINDA JENKINS, did knowingly possess and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, Bank Fraud in violation of 18 U.S.C. § 1344, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

A TRUE BILL. / / ..


FOREPERSON

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.


JOHN E. HIGGINS, #19546
ASSISTANT UNITED STATES ATTORNEY